

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-06563-LJL

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO HOLD DEFENDANT
IN CIVIL CONTEMPT AND TO IMPOSE SANCTIONS**

Upon consideration of Plaintiffs' motion for sanctions under Federal Rule of Civil Procedure 37, it is hereby ORDERED that Plaintiffs' motion is granted.

It is further ORDERED that Mr. Giuliani is in civil contempt of Court;

It is further ORDERED that an adverse inference will be entered against Mr. Giuliani that Mr. Giuliani did not form an intention to live permanently at the Palm Beach Condo prior to August 8, 2024;

It is further ORDERED that an adverse inference will be entered against Mr. Giuliani that Mr. Giuliani did not actually occupy the Palm Beach Condo as a permanent residence prior to August 8, 2024;

It is further ORDERED that Mr. Giuliani is precluded from relying on, referencing, or otherwise using any documents in support of his claim that he established the Palm Beach Condo as a homestead prior to August 8, 2024 unless Mr. Giuliani makes a complete production at least two weeks in advance of his deposition, provides full information regarding his discovery

compliance efforts to allow Plaintiffs to test the completeness of the production, and files a sworn affidavit with this Court attesting to the fact that the production is complete;

In the alternative it is ORDERED that Mr. Giuliani must show cause why such adverse inferences and/or order for preclusion should not be entered against him.

SO ORDERED.

December __, 2024

Hon. Lewis J. Liman

United States District Judge